



*International Air Transport Association*

Robert C. Ashby  
Deputy Assistant General Counsel  
for Regulation and Enforcement  
U.S. Department of Transportation  
400 Seventh Street, S.W.  
Room 10424  
Washington, D.C. 20590

Re: Docket OST-2004-19482

Dear Mr. Ashby:

IATA, the International Air Transport Association, hereby supports the January 6, 2005 request by ATA, the Air Transport Association, for an extension of the comment period for the Department's Notice of Proposed Rulemaking (NPRM) with respect to Nondiscrimination on the Basis of Disability in Air Travel.

As the Department is well aware, having worked on preparation of the NPRM in the more than four years since the passage of the Wendell H. Ford Aviation Investment and Reform Act for the 21st Century (AIR-21), the issues involved are complex both legally and in terms of airline operations. The proposals of the NPRM would impose wide-ranging obligations on carriers from all parts of the world, carriers whose operational profiles in many cases differ significantly from those of the U.S. carriers to which Part 382 has applied to date.

IATA has begun the process of consulting with its Member airlines in order to prepare comments to the Department. In many cases, the carriers have informed IATA that they are still working on completing the analyses necessary to provide complete reasoned comments, particularly on issues such as website accessibility, cost estimates and possible effects on code-shared operations. Additional time is also required for carriers to complete their research and analyses of areas of actual or potential conflict of the proposals of the NPRM with the legal requirements of other sovereigns.

For all of the reasons cited by ATA and because the European Community is reportedly within weeks if not days of issuing its proposed Regulation on the rights of persons with reduced mobility when traveling by air, IATA supports ATA's request for an extension of the comment period, and respectfully suggests that the 30 day extension requested by ATA is the

*minimum* needed for proper analysis by the carriers to which these new regulations would apply.

Thank you for your attention and consideration. Please let us know if you have any questions.

Respectfully submitted,

The image shows a handwritten signature in cursive script that reads "David M. O'Connor". To the right of the signature, there are the initials "COK" written in a similar cursive style.

IATA  
International Air Transport Association  
David M. O'Connor  
Director  
Government & Industry Affairs, United States